

**SOAH DOCKET NO. 582-16-1820
TCEQ DOCKET NO. 2015-1221-PST-E**

EXECUTIVE DIRECTOR OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY; Petitioner,	§ § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
VS.		
JOE'S & CHO, INC. DBA JOES FUTURE FOOD MART, Respondent.		

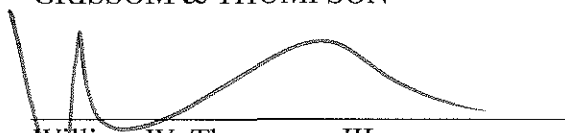
**RESPONDENT'S RESPONSE TO THE EXECUTIVE DIRECTOR'S
DISCOVERY REQUESTS**

TO: The Executive Director of the Texas Commission on Environmental Quality, by and through its attorney of record, Jake Marx, Office of Legal Services, MC-175, P.O. Box 13087, Austin, Texas 78711-3087.

COMES NOW Respondent, Joe's & Cho, Inc. d/b/a Joes Future Food Mart, and files this Response to Executive Director's Written Discovery Requests.

Respectfully submitted,

GRISSOM & THOMPSON

A handwritten signature in black ink, appearing to read 'William W. Thompson, III', written over a horizontal line.

William W. Thompson, III

bill@gandtlaw.com

State Bar No. 19960050

Donald H. Grissom

don@gandtlaw.com

State Bar No. 08511550

509 West 12th Street

Austin, Texas 78701

(512) 478-4059

(512) 482-8410 fax

DISCLOSURES

Pursuant to Rule 194 of the Texas Rules and Civil Procedure, you are requested to disclose the information or material described in Rule 194.2(a), (b), (c), (e), (f), and (i), i.e.,

Rule 194.2(a): The correct names of the parties to the lawsuit;

RESPONSE: As named in the Executive Director's Preliminary Report and Petition.

Rule 194.2(b): The name, address, and telephone number of any potential parties;

RESPONSE: No others.

Rule 194.2(c): The legal theories and, in general, the factual bases of the responding party's claims or defenses;

RESPONSE: Respondent did not fail to monitor its USTs for releases at a frequency of at least once every month (not exceeding 35 days between each monitoring).

Rule 194.2(e): The name, address, and telephone number of persons having knowledge of the relevant facts, and a brief statement of each identified person's connection with the case;

RESPONSE:

Ae Ok Park
Shanna Park
Anna Cho
c/o Grissom & Thompson, LLP
509 W. 12th Street
Austin, Texas 78701
(512) 478-4059

Ms. Park and Ms. Cho are the owners of the Respondent company.

Trinity Marketing & Distributing Co., Inc.
Curtis Graf
317 Steeplechase Drive
Irving, Texas 75062
(214) 212-2211

Trinity Marketing & Distributing Co., Inc. is a company who performed work on the cathodic protection system on the underground storage tanks located at the Facility.

Rule 194.2(f): For any expert testifying:

- (1) The expert's name, address and telephone number;**
- (2) The subject matter on which the expert will testify;**

- (3) The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, or employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (4) If the expert is retained by, employed by, or otherwise subject to the control of the responding party; and

RESPONSE: None have been designated at this time, but Respondent reserves the right to supplement.

Rule 194.2(i): Any witness statements described in Rule 192.3(h).

RESPONSE: The inspection report from the TCEQ site inspector.

RESPONSE TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that you currently own the USTs at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 2:

Admit that you have owned the USTs at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 3:

Admit that you currently operate the USTs at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 4:

Admit that you have operated the USTs at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 5:

Admit that from June 10, 2015 to present, three USTs have existed at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 6:

Admit that the UST system at 4225 Miller Avenue in Fort Worth, Tarrant County, Texas (the "Facility") is required to have release detection.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 7:

Admit that on June 10, 2015 and June 11, 2015, the Facility did not have adequate release detection for the USTs.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 8:

Admit that on June 10, 2015 and June 11, 2015, the Facility was not properly monitoring the USTs for releases.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 9:

Admit that you sent the TCEQ release detection records that were missing the monthly water check entries for the diesel, super, and unleaded tanks at the Facility for the months of January, February, March, April, and May of 2015.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 10:

Admit that you sent the TCEQ release detection records that were missing the daily book inventory entries for the diesel, super, and unleaded tanks at the Facility for the months of January, February, March, April, and May of 2015.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 11:

Admit that you sent the TCEQ release detection records that were missing the daily over/short value entries for the diesel, super, and unleaded tanks at the Facility for the months of January, February, March, April, and May of 2015.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 12:

Admit that you sent the TCEQ release detection records that were missing the monthly reconciliation entries for the diesel, super, and unleaded tanks at the Facility for the months of January, February, March, April, and May of 2015.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 13:

Admit that you sent the TCEQ release detection records that were missing the leak check entries for the diesel, super, and unleaded tanks at the Facility for the months of January, February, March, April, and May of 2015.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 14:

Admit that you did not do inventory control properly from January 2015 through May 2015.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 15:

Admit that you did not do inventory control properly from June 2014 through December 2014.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 16:

Admit that you were not using vapor monitoring as a release detection method for the USTs at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 17:

Admit that you were not using statistical inventory reconciliation ("SIR") as a release detection method for the USTs at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 18:

Admit that you were not using groundwater monitoring as a release detection method for the USTs at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 19:

Admit that you were not using interstitial monitoring as a release detection method for the USTs at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 20:

Admit that you were not using any secondary containment barriers as a method of release detection for the USTs at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 21:

Admit that you were not using any alternative release detection method that has been approved by the TCEQ rules to monitor the UST system at the Facility at any time since August 27, 2013.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 22:

Admit that the USTs at the Facility are not exempt or excluded from regulation by the TCEQ.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 23:

Admit that the penalty of three thousand seven hundred fifty dollars (\$63,000.00) recommended by the Executive Director is reasonable given the alleged violation in this enforcement matter and considering the factors set forth in TEX. WATER CODE § 7.053.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 24:

Admit that the penalty of three thousand seven hundred fifty dollars (\$63,000.00) recommended by the Executive Director is necessary given the alleged violation in this enforcement matter and considering the factors set forth in TEX. WATER CODE § 7.053.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 25:

Admit that the administrative penalty was calculated in accordance with the April 1, 2014 TCEQ Penalty Policy.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 26:

Admit that the April 1, 2014 Penalty Policy incorporates the factors in TEX. WATER CODE § 7.053 into the penalty calculation.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 27:

Admit that you can afford to pay the full amount (\$63,000.00) of the administrative penalty.

RESPONSE: Deny

REQUEST FOR ADMISSION NO. 28:

Admit that you are responsible for paying the administrative penalty (\$63,000.00).

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 29:

Admit that the inventory control records, attached hereto as "Attachment A," titled Monthly Inventory Record(s), are true and correct copies that you submitted to the TCEQ by email on June 15, 2015.

RESPONSE: Admit

REQUEST FOR ADMISSION NO. 30:

Admit that the signed Agreed Order, attached hereto as "Attachment B," styled Agreed Order Docket No. 2013-1777-PST-E, is a true and correct copy that you signed on April 10, 2014.

RESPONSE: Admit

RESPONSE TO INTERROGATORIES

INTERROGATORY NO. 1:

When did you begin conducting inventory control properly by completing all columns on the monthly inventory records?

RESPONSE: Respondent objects to this Interrogatory on the basis that it is overly broad, unlimited in scope, "monthly inventory records" has not been defined, and it is not narrowly tailored to lead to the discovery of admissible evidence.

INTERROGATORY NO. 2:

What method or methods of release detection, dating back since August 2013, do you use to monitor for or detect releases at the Facility?

RESPONSE: Monthly inventory control, ATG, tank tightness tests.

INTERROGATORY NO. 3:

Should you contend that at the time of the June 10, 2015 to June 11, 2015 TCEQ investigation, the Facility had proper release detection for the USTs, please state the basis of your contention.

RESPONSE: Respondent conducts daily inventory control, tank tightness tests, and automatic tank gauging.

INTERROGATORY NO. 4:

How do you ensure that releases of petroleum from the USTs or UST system at the Facility are not entering the environment or ground water?

RESPONSE: Respondent has groundwater monitoring wells and cathodic protection.

INTERROGATORY NO. 5:

When did you come into compliance with Ordering Provision 2.b. of TCEQ Agreed Order Docket No. 2013-1777-PST-E?

RESPONSE: After April 10, 2014.

INTERROGATORY NO. 6:

Please explain how you came into compliance with Ordering Provision 2.b. of TCEQ Agreed Order Docket No. 2013-1777-PST-E?

RESPONSE: Respondent began maintaining inventory control records, conducting inventory control and automatic tank gauging

INTERROGATORY NO. 7:

Please identify all witnesses you intend to call to testify at the evidentiary hearing regarding this enforcement matter in accordance with TEX. R. CIV. P. 192.3(d).

RESPONSE: Shanna Park and Anna Cho

INTERROGATORY NO. 8:

Please identify each person with whom you have consulted, or from whom you have sought expert advice relating to the subject matter of this case and who has not been identified in response to the Requests for Disclosure, if such consultant's or expert's work product forms the basis either in whole or in part of the opinions of any expert you anticipate calling or may call as a witness.

RESPONSE: None

INTERROGATORY NO. 9:

Please identify all documents that are relevant to the subject matter of this enforcement action or which will lead to relevant evidence and provide the physical location of each such document.

RESPONSE: All documents identified in response to Requests for Production herein.

INTERROGATORY NO. 10:

Please identify all persons who have possession of any and all documents identified in response to Interrogatory No. 7.

RESPONSE: Shanna Park and Anna Cho

INTERROGATORY NO. 11:

If you refuse to produce any document(s) in response to the Executive Director's Requests for Production, please identify each document, state the reasons for each such refusal, and include any and all specific privilege(s) being claimed.

RESPONSE: N/A

INTERROGATORY NO. 12:

If you contend that you have not violated TCEQ rules or state or federal environmental statutes, please state the basis of your contention.

RESPONSE: Respondent has properly performed release detection procedures at the Facility.

INTERROGATORY NO. 13:

If you contend that the penalty in the current petition is incorrectly calculated, please state the basis of your contention.

RESPONSE: Respondent will supplement this response.

INTERROGATORY NO. 14:

How do you think the penalty in this case should be calculated?

RESPONSE: The penalty should be calculated so that the amount owed by Respondent equals \$0.00, see No. 15 below.

INTERROGATORY NO. 15:

Should you contend that you should not be assessed the maximum administrative penalty allowed by law, please state the basis of your contention.

RESPONSE: Respondent does not have the financial ability to pay the maximum penalty.

INTERROGATORY NO. 16:

Please describe in detail, including the names of any contractors and/or employees involved and all relevant dates, all efforts by you to comply with TCEQ rules at the Facility, including

instances where the TCEQ Small Business Administration, associated TCEQ EnviroMentor, or other TCEQ employees attempted to assist you.

RESPONSE: Respondent does not recall who, when, or if anybody attempted to assist her.

INTERROGATORY NO. 17:

Please describe any and all activities by you which could or might be considered "good faith" on your behalf with regard to the alleged violations in this enforcement matter.

RESPONSE: Respondent has filled out all columns on the release detection and inventory control records.

INTERROGATORY NO. 18:

Please describe in detail each and every fact which you contend disproves the allegations in the EDCRP.

RESPONSE: Respondent provided the TCEQ with its inventory records evidencing its compliance with the TCEQ rules.

INTERROGATORY NO. 19:

Please state the full name, address, telephone number, job title, and employer of each person answering, supplying information, and/or assisting in answering these Interrogatories on behalf of Joe's & Cho, Inc.

RESPONSE: Shanna Park and Anna Cho, c/o Grissom & Thompson, LLP, 509 W. 12th Street, Austin, Texas 78701, (512) 478-4059.

INTERROGATORY NO. 20:

If you contend that you did not own or operate the USTs at the Facility on or at any time after August 27, 2013, please explain in detail the basis of that contention.

RESPONSE: Respondent does not make this contention.

INTERROGATORY NO. 21:

If you contend that you are financially unable to pay the administrative penalty, please explain the financial reasons for your claim of inability to pay the full amount of the penalty, and explain the amount that can be paid. Your response should consider, but is not limited to the following: cash flow ability, revenue, short-term deferral of capital expenditures, ability to reduce expenses, borrowing capacity, existing liquid assets, and liquidation of or borrowing against non-essential assets. Please include a list of all forms and amounts of revenue; all presently outstanding loans (including the loan amount, balance and lender); a list of all corporate affiliates that the company

has an ownership interest in the company; a list of company vehicles, including make, model, year, purchase date, purchase price, vehicle use, and primary driver; a list of shareholders of the company's voting stock, including the number of shares held, by shareholder, and the dollar value; and a list of corporate officers and each officer's total annual remuneration for the last three (3) years. Remuneration includes, but is not limited to, salary, wages, dividends, loans, vehicle allowances, bonuses, deferred compensation, stock option, life insurance, profit-sharing, and retirement account contributions.

RESPONSE: Respondent only owns one facility and the facility has very low sales volume. Respondent is unable to pay the penalty because of the low cash flow, the monthly expenses of operating the facility and outstanding loan payments. All documents evidencing Respondent's inability to pay will be produced herein.

INTERROGATORY NO. 22:

If you contend the USTs at the Facility are exempt or excluded from TCEQ regulation, please state the basis of your contention.

RESPONSE: Respondent does not make this contention.

RESPONSE TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all documents prepared by experts, consulting or otherwise (i.e. testifying), identified in Interrogatory No. 2.

RESPONSE: None

REQUEST FOR PRODUCTION NO. 2:

Please produce all documents relating to any ownership interest you held at any time in any real property comprising the Facility or the day-to-day control or operatorship of the USTs at the Facility, including, but not limited to, any leases, deeds, certifications, licenses, or contracts.

RESPONSE: Respondent objects to this request on the basis that the information requested is publically available and therefore equally available to the requesting party. Respondent does not deny that it owns the Property in question.

REQUEST FOR PRODUCTION NO. 3:

Please produce any and all documents which reflect, refer, evidence, relate, or describe in any manner any defense upon which you may rely in the hearing on this enforcement matter.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 4:

Should you contend that at the time of June 10, 2015 to June 11, 2015 TCEQ investigation, the Facility has release detection for the USTs at the Facility, please produce any and all documents that support your contention.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 5:

Please produce any and all documents relating to release detection and inventory control at the Facility from August 2013 to present.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 6:

Please produce any and all documents relating to any occasion in which enforcement proceedings have been initiated and/or brought against you by the TCEQ, another state agency in the State of Texas, the Environmental Protection Agency ("EPA"), or any local governmental entity or municipality.

RESPONSE: Respondent objects to this request on the basis that it seek information that is equally available to the requesting party.

REQUEST FOR PRODUCTION NO. 7:

Please produce all exhibits, demonstrative or otherwise, you expect to introduce at the evidentiary hearing in this matter.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 8:

Please produce all documents and tangible items you might attempt to show the judge at the administrative hearing.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 9:

Please produce all documents which were used in any way, however insignificant, to prepare your responses to the preceding Interrogatories, Requests for Disclosure, and Requests for Admission, or which are otherwise mentioned in your responses, unless produced in response to another Request for Production.

RESPONSE: No others.

REQUEST FOR PRODUCTION NO. 10:

Please produce any and all documents identified in your answers to the Executive Director's Interrogatories, above, which have not been produced in response to any previous Request for Production.

RESPONSE: None.

REQUEST FOR PRODUCTION NO. 11:

Should you contend that the administrative penalty in this case is unnecessary or unreasonable, please produce any and all documents that support your contention.

RESPONSE: See "Joe's 0001-0003"

REQUEST FOR PRODUCTION NO. 12:

If you did not own or operate the USTs at the Facility at any time after August 27, 2013, please produce any and all documents that support your contention.

RESPONSE: N/A

REQUEST FOR PRODUCTION NO. 13:

Please produce all deeds, leases, ownership contracts, operations agreements, and alike for the Facility.

RESPONSE: Respondent objects to this request on the basis that the request seeks information that is publically available and therefore equally available to the requesting party.

REQUEST FOR PRODUCTION NO. 14:

If you contend that you are financially unable to pay the administrative penalty assessed in this enforcement action, please produce any and all documents that support your contention. Please include:

- Completed and signed Financial Inability to Pay Forms from (included as "Attachment C") from TCEQ.
- Completed and signed federal corporate income tax returns, including all schedules, forms, and attachments, for the last three (3) filing years. If the returns are copies without signature(s), please sign them;
- Financial statements prepared in accordance with generally accepted accounting principles for the last three (3) years and most currently monthly or quarterly period. The financial statements should include balance sheets, income statements, cash flow

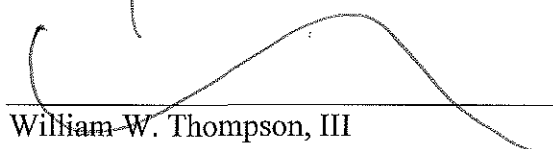
statements, and notes to the financial statements. Provide audited statements if they have been prepared;

- Completed copies of quarterly reports filed with the Texas Workforce Commissions for the four (4) quarters of the most recently completed fiscal year and the completed quarters-to-date for the current year; if organization is not tax exempt, completed and signed federal corporate income tax returns, including all schedules, forms, and attachments, for the last three (3) filing years;
- Copies of the note agreements for each outstanding loan;
- Copies of the most recent three (3) months bank statements for each account; and
- Copies of all signed lease agreements to which the company is a party as lessor or lessee.

RESPONSE: These documents will be produced for copying at a mutually convenient date and location. Respondent specifically reserves the right to supplement this response.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been either hand-delivered, sent by U.S. Mail, Certified Mail Return Receipt Requested, and/or Facsimile Transmission to the following service list on this ____ day of June 2016.



William W. Thompson, III

Jake Marx
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building A
Austin, Texas 78753
(512) 239-5111
(512) 239-3434 fax

Rudy Calderon, Public Interest Counsel
Texas Commission on Environmental Quality
Office of the Public Interest Counsel
P.O. Box 13087, MC 103
Austin, Texas 78711
512-239-6377 fax

Bridget Bohac
Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

VERIFICATION

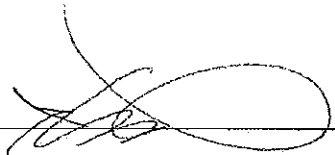
STATE OF TEXAS

COUNTY OF Tarrant

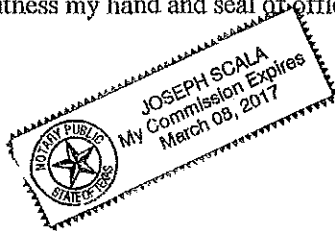
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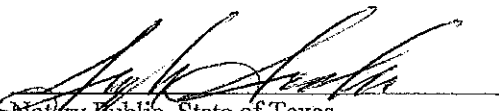
BEFORE ME, the undersigned authority, on this day personally appeared Shanna Park known to me to be the person whose name is subscribed to the foregoing instrument, who, after being duly sworn and deposed, says that the above and foregoing Answers to Interrogatories are true and correct.

Shanna Park



SUBSCRIBED AND SWORN TO BEFORE ME on this 26 day of June 2016, to certify which witness my hand and seal of office.




Notary Public, State of Texas



TRINITY MARKETING & DIST. CO., INC.

317 Steeplechase Drive
Irving, Texas 75062
972-579-7540

SERVICE INVOICE

Date	Invoice #
8/14/2013	5474

Bill To
Future Food Mart Fina # 368 4225 Miller Ave. Ft Worth, Texas 76119

Location
Future Food Mart Fina #368 4225 Miller Ave. Ft Worth, TX 76119

				Rep
				JFK
Qty	Item	Description	Price Each	Amount
0.5	Travel	Travel to Jobsite - August 8	65.00	32.50
34	Mileage	mileage surcharge	0.75	25.50
1	Labor	Description of work: TLS 300 no display, no inventory printout. Replaced battery and reprogrammed. Found diesel probe out. Needs to be replaced. Part ordered.	65.00	65.00
1	576010-695	LITHIUM BATTERY CPU 3.5V	19.24	19.24
1	329211-001	SHAFT PAPER ROLL	9.99	9.99
0.5	Travel	Travel to Jobsite - August 14	65.00	32.50
34	Mileage	mileage surcharge	0.75	25.50
3	Labor	Description of work: TLS 300 diesel probe out. CSLD chip missing. Replaced probe. Installed CSLD chip. Programmed, tested. Unit is working properly at this time. Replaced all probe wiring from tanks to building.	65.00	195.00
1	846390-107	8 Foot Mag PLUS Maguctostrictive Probe .1 GPH	1,428.00	1,428.00
1	846400-001	Diesel mag PLUS float kit 2"	219.84	219.84
TOTAL				
Balance Due				

Notice is hereby given and published that we offer no warranty other than manufacturer's warranty on goods we sell and that we in no way will accept responsibility for labor, material, consequential damage or charges, which are not covered by the manufacturer's warranty.



TRINITY MARKETING & DIST. CO., INC.

317 Steeplechase Drive
Irving, Texas 75062
972-579-7540

SERVICE INVOICE

Date	Invoice #
8/14/2013	5474

Bill To
Future Food Mart Fina # 368 4225 Miller Ave. Ft Worth, Texas 76119

Location
Future Food Mart Fina #368 4225 Miller Ave. Ft Worth, TX 76119

				Rep
				JFK
Qty	Item	Description	Price Each	Amount
1	330161-003	Module CSLD SW-300 Series	1,087.43	1,087.43
180	Belden 88760	Belden 88760	1.25	225.00
9865				
450.00				
TOTAL				\$3,365.50
Balance Due				\$3,365.50

Notice is hereby given and published that we offer no warranty other than manufacturer's warranty on goods we sell and that we in no way will accept responsibility for labor, material, consequential damage or charges, which are not covered by the manufacturer's warranty.



TRINITY MARKETING & DIST. CO., INC.

317 Steeplechase Dr.
Irving, Texas 75062

Curtis-214-212-2211

INVOICE

Date	Invoice #
8/14/2013	5473

Bill To
Future Food Mart Fina # 368 4225 Miller Ave. Ft Worth, Texas 76119

Work Done At
Future Food Mart Fina #368 4225 Miller Ave. Ft Worth, TX 76119

PO #

Due on receipt

Description	Amount
Furnish all Labor, Tools, Trucks, Equipment, Materials, Final Testing and Expertise to Travel to the above location to install A Cathodic Protection System on 2 Existing UST's. 50% prior to mobilization, 50% upon furnishing test results.	6,500.00
<div>Total : 9865. = Rec-8-28-13 8/28 - 2865. Balance : 7000. 9/23 (#9264) paid - 2000. 10/31 (#9395) 5000. - 2000 3000.-</div> <div>Balance @ 2000.00 on the 15th of each following Month until paid CB</div>	
Balance Due	\$6,500.00
Payments	\$0.00
Total	\$6,500.00
E-mail	Web Site
trinitymarketinganddist@yahoo.com	texasfuelsite.com